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7 Counsel For Official Committee of Unsecured Creditors

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9 **UNITED STATES BANKRUPTCY COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **SANTA ANA DIVISION**

12	In re:	Chapter 11
13	THE LITIGATION PRACTICE GROUP, P.C.,	Case No. 8:23-bk-10571-SC
14	Debtor.	<b>SIXTH STIPULATION TO EXTEND DEADLINE FOR CHAPTER 11 TRUSTEE TO FILE A PLAN AND DISCLOSURE STATEMENT</b>
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1 The Official Committee of Unsecured Creditors (the “Committee”) of The Litigation Practice  
2 Group P.C., Richard A. Marshack, in his capacity as the chapter 11 trustee of The Litigation Practice  
3 Group P.C. (the “Trustee” and, together with the Committee, the “Parties”), stipulate and agree as  
4 follows (the “Stipulation”).

## RECITALS

6       A.      On March 20, 2023 (the “Petition Date”), The Litigation Practice Group P.C. (the  
7      “Debtor”), filed a voluntary petition under chapter 11 of title 11 of the United States Code, 11 U.S.C.  
8      §§ 101 *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Central District  
9      of California (the “Court”), commencing the above-captioned bankruptcy case (the “Bankruptcy  
10     Case”).

11 B. On May 8, 2023, the Court entered an order [Docket No. 65] approving the  
12 appointment of the Trustee.

13       C.     On June 23, 2023, the Office of the United States Trustee appointed [Docket No. 134]  
14 the Committee, which was amended [Docket No. 157] to increase the number of Committee members  
15 on June 29, 2023.

16       D.      On August 2, 2023, the Court entered an order [Docket No. 352] (the “Sale Order”)  
17      approving the sale of certain assets, pursuant to that certain *Agreement of Purchase and Sale and*  
18      *Joint Escrow Instructions* (the “APA”).

19       E.      On August 18, 2023, the Committee and the Trustee initiated a standing weekly case  
20      negotiation and status meeting among their respective professionals and the Trustee.

21 F. On August 25, 2023, the Court entered a *Scheduling Order After Status Conference*  
22 [Docket No. 452] (the “Scheduling Order”) setting October 24, 2023, as the deadline for the Trustee  
23 to file and serve a chapter 11 plan and related disclosure statement.

24       G.     The Court has entered five stipulated [Docket Nos. 582, 742, 786, 908, 932] orders  
25 [Docket Nos. 584, 744, 789, 912, 936] extending the deadline for the Trustee to file and serve a  
26 chapter 11 plan and related disclosure statement. As of the date of this Stipulation, the current  
27 deadline to file and serve a chapter 11 plan and related disclosure statement is February 16, 2024 (the  
28 “Filing Deadline”).

1 H. Since the entry of the Scheduling Order on August 25, 2023, the Parties have been  
2 engaged in ongoing and substantive negotiations during their weekly status meetings and in separate  
3 meetings with the aim of filing a joint chapter 11 plan of liquidation and related disclosure statement.  
4 The Parties have also exchanged comments to a draft plan and liquidating trust agreement, which are  
5 substantive in nature and require additional time to evaluate and review specific areas of concern. As  
6 of the previous stipulation [Docket No. 932], the Parties had potentially reached an impasse finalizing  
7 the terms of a liquidating trust agreement. The previous extension of the Filing Deadline provided  
8 the Parties additional time to resolve the outstanding issue. As of the date of this Stipulation, the  
9 Parties have reached agreement concerning the terms of a liquidating trust agreement.

10       I.       The Parties and their professionals continue to evaluate, among other things, post-  
11 closing financial reporting pursuant to audit requests submitted by the Committee under the APA,  
12 and responses to those requests from the purchaser, which are necessary to complete a fulsome plan  
13 analysis, including a liquidating analysis and plan projections.

14 J. On January 2, 2024, the Court entered an order [Docket No. 804] establishing February  
15 23, 2024 as the deadline for filing certain claims, including general unsecured claims (the “Bar Date”).  
16 In light of the forthcoming Bar Date, the Parties believe an extension of the Filing Deadline beyond  
17 the Bar Date will provide additional time to prepare a more fulsome liquidation analysis for  
18 submission concurrently with a plan and disclosure statement.

19       K.     In light of the foregoing, and with the expectation of finalizing negotiations on the  
20 plan, disclosure statement, and related confirmation procedures motion, the Parties have agreed that  
21 it is in the best interests of the estate to agree to an extension of the Filing Deadline.

## **STIPULATION**

23 NOW, THEREFORE, based on the foregoing, the Parties agree and stipulate as follows:

24           1. The Parties restate and incorporate the foregoing Recitals set forth above.

25           2. The Filing Deadline for the Trustee to file a chapter 11 plan and disclosure statement

26 shall be extended from February 16, 2024, through and including March 8, 2024.

27           3. Notwithstanding anything to the contrary contained herein, this Stipulation is without

28 prejudice to further requests for an extension of the deadlines set forth in this Stipulation.

1 DATED this 16th day of February 2024.  
2

3 **FOX ROTHSCHILD LLP**

4 By: /s/ Nicholas A. Koffroth

5 Keith C. Owens (Bar No. 184841)  
Nicholas A. Koffroth (Bar No. 287854)  
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7 *Counsel for the Committee*

8 **MARSHACK HAYS WOOD LLP**

9 By: D. Edward Hays

10 D. Edward Hays (Bar No. 162907)  
Laila Masud (Bar No. 311731)  
870 Roosevelt  
11 Irvine, California 92620  
12 *Counsel for Trustee*

1 **PROOF OF SERVICE OF DOCUMENT**

2 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business  
3 address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

4 A true and correct copy of the foregoing documents entitled: SIXTH STIPULATION TO EXTEND  
5 DEADLINE FOR CHAPTER 11 TRUSTEE TO FILE A PLAN AND DISCLOSURE STATEMENT on  
6 the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated  
7 below:

8 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant  
9 to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and  
10 hyperlink to the document. On 2/16/2024, I checked the CM/ECF docket for this bankruptcy case or  
11 adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to  
12 receive NEF transmission at the email addresses stated below:

- 13 • **Eric Bensamochan** eric@eblawfirm.us, G63723@notify.cincompass.com
- 14 • **Ronald K Brown** ron@rkbrownlaw.com
- 15 • **Christopher Celentino** christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
- 16 • **Shawn M Christianson** cmcintire@buchalter.com, schristianson@buchalter.com
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- **Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com;eweiman@wrslawyers.com

10 2. **SERVED BY UNITED STATES MAIL:** On 2/16/2024, I served the following persons and/or  
11 entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and  
12 correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed  
as follows.

13 Debtor

14 The Litigation Practice Group P.C.  
17542 17th St., Suite 100  
Tustin, CA 92780

15 See attached for additional parties

16 3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION  
17 OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling  
18 LBR, on 2/02/2024, I served the following persons and/or entities by personal delivery, mail service, or (for  
19 those who consented in writing to such service method), by facsimile transmission and/or email as follows.  
Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will  
be completed no later than 24 hours after the document is filed.

20 The Honorable Scott C. Clarkson  
United States Bankruptcy Court, Central District of California  
21 411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, CA 92701-4593

23 I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

25 2/16/2024

Date

Kimberly Hoang

Printed Name

/s/ Kimberly Hoang

Signature

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### **Additional Parties Served by U.S. Mail**

## **Creditors who have the 20 largest unsecured claims**

Debt Validation Fund II, LLC  
5075 Lower Valley Road,  
Atglen, PA 19310

MC DVI Fund 1, LLC; MC  
DVI Fund 2, LLC  
598 Cottonwood Dr.,  
Glenview, IL 60026

Validation Partners LLC  
1300 Sawgrass Pkwy, Ste. 110  
Sunrise, FL 33323

Marich Bein LLC  
99 Wall Street, Ste 2669  
New York, NY 10005

Business Centers of America  
1100 Sir Francis Drake Blvd,  
Ste 1, Kentfield, CA 94904

JP Morgan Chase  
3 Park Plaza, Ste 900  
Irvine, CA 92614

CA Franchise Tax Board  
PO Box 942857  
Sacramento, CA 94257-0511

Outsource Accelerator Ltd  
City Marque Limited  
Unit 8801-2 Bldg. 244-248  
Des Voeux Rd.  
Central Hong Kong

Collaboration Advisors  
400 Dorla Court  
Zephyr Cove, NV 89448

Anthem Blue Cross  
PO Box 511300  
Los Angeles, CA 90051-7855

Azevedo Solutions Groups, Inc.  
420 Adobe Canyon Rd.  
Kenwood, CA 95452

Debt Pay Pro  
1900 E Golf Road, Suite 550  
Schaumburg, IL 60173

1 Sharp Business Systems  
2 8670 Argent St  
3 Santee, CA 92071

4 Tustin Executive Center  
5 1630 S Sunkist Steet, Ste A  
6 Anaheim, CA 92806

7 Exela Enterprise Solutions  
8 2701 E. Grauwyler Road  
9 Irving, TX 75061

10 Netsuite-Oracle  
11 2300 Oracle Way  
12 Austin, TX 78741

13 Credit Reporting Service Inc  
14 548 Market St, Suite 72907  
15 San Francisco, CA 94104-5401

16 Document Fulfillment Services  
17 2930 Ramona Ave #100  
18 Sacramento, CA 95826

19 Executive Center LLC  
20 5960 South Jones Blvd  
21 Las Vegas, NV 89118

22 LexisNexus  
23 15500 B Rockfield Blvd  
24 Irvine, CA 92618

25 **Secured Creditors**

26 Diverse Capital LLC  
27 323 Sunny Isles Blvd., Suite 503  
28 Sunny Isles, FL 33154

29 City Capital NY  
30 1135 Kane Concourse  
31 Bay Harbour Islands, FL 33154

32 Counsel for secured creditor Fundura Capital Group  
33 Mitchell B. Ludwig  
34 Knapp, Petersen & Clarke  
35 550 North Brand Blvd., Suite 1500  
36 Glendale, CA 91203